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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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UNITED STATES OF AMERICA,  
  
Plaintiff,

vs.

RYAN LEE MOWER,  
  
Defendant.

Case No. 2:19CR00394-RJS-DBP

MOTION FOR ORDER  
OF FORFEITURE

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

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Pursuant to Fed R. Crim. P. Rule 32.2(b), the United States of America respectfully submits this Motion for Order of Forfeiture. In support of this motion, the government states:

1. On October 22, 2020, a Superseding Indictment was entered with the court charging Ryan Lee Mower with Wire Fraud Conspiracy, in violation of 18 U.S.C. §§ 1343 and 1349, (Count 1), Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 2, (Counts 2-12), and Money Laundering - Spending, in violation of 18 U.S.C. §§ 1957 and 2, (Counts 13-23).

2. On January 12, 2021, a Fifth Bill of Particulars regarding forfeiture was entered with the court. ECF No. 246.

3. The Court's jurisdiction in this matter is founded in 28 U.S.C. § 1355. The United States sought forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853(p).

4. On April 22, 2021, the defendant, Ryan Lee Mower, pleaded guilty to Wire Fraud Conspiracy. As a result of the plea of guilty the defendant must forfeit to the United States all property, acquired from or traceable to the offenses and all property that was used to facilitate the offenses, in violation of 18 U.S.C. § 1349, including, but not limited to, the following specific property:

- \$125,000.00 representing proceeds from the sale of a 2017 Centurion Boat and trailer
- \$5,800.00 representing proceeds from the sale of a 2016 Polaris Pro RMK
- \$20,000.00 representing proceeds from the sale of a 2016 Artic Cat and Charmac trailer
- \$14,000.00 representing proceeds from the sale of a 2017 Polaris RZR 900 S4
- \$65,981.62 representing proceeds of TD Ameritrade Accounts ending in 9554, 7889 and 3469
- \$17,160.00 representing proceeds from the sale of a 2016 Ford Mustang
- \$22,320.00 representing bribe payments
- \$5,000.00 proceeds from the sale of a Kawasaki KVF 750 ATV
- \$32,161.67 representing proceeds from the sale of a 2017 Ford F-350
- \$7,440.00 representing a bribe payment made to Ryan Mower
- \$1000.00 representing a bribe payment made to Ryan Mower
- \$1,000.00 representing a bribe payment made to Ryan Mower
- \$238,721.10 representing proceeds of the sale of real property located at 4649 Aspen Road, Coalville, Utah

- \$1,000.00 representing a bribe payment made to Ryan Mower

5. In addition to the property listed above, the defendant agreed to the entry of a forfeiture money judgment in the amount of \$276,108.68.

6. Forfeiture of the above-identified property pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), and 21 U.S.C. § 853(p) is appropriate based on the evidence presented in the Superseding Indictment filed on October 22, 2020, and the Statement in Advance of Plea filed on April 22, 2021. The United States has established the requisite nexus between the property and the offenses.

7. In accordance with the provisions of Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States requests that it be permitted to undertake whatever discovery is necessary to identify, locate, or dispose of property subject to forfeiture and/or substitute property.

8. After discovery of any specific substitute asset, the United States will move, pursuant to Fed. R. Crim. P. 32.2(e) for an amended order of criminal forfeiture for the specific substitute asset. Upon entry of such an order, the United States will provide notice of the order allowing third parties who claim an interest in any such asset to petition the court for a hearing to adjudicate the validity of their interest in the asset, pursuant to 21 U.S.C. § 853.

9. The United States requests pursuant to Fed. R. Crim. P. 32.2(b)(2)(B) “to allow the parties to suggest revisions or modifications before the order becomes final as to the defendant under Rule 32.2(b)(4).” We also request that the court reference the forfeiture order in its judgment. Fed. R. Crim. P. 32.2(b)(4)(B).

WHEREFORE, the United States respectfully requests that this Court enter an Order of Forfeiture, forfeiting to the United States the property described herein and in the Superseding Indictment, and order the Federal Bureau of Investigations to maintain custody of the forfeited property in accordance with the law.

Dated this 9<sup>th</sup> day of June, 2021.

ANDREA T. MARTINEZ  
Acting United States Attorney

/s/ Cy H. Castle  
CY H. CASTLE  
Assistant U.S. Attorney